IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN THE MATTER OF)	
THE EXTRADITION OF)	No. 24-mj-01365-DLC
T.C.)	

PROPOSED BRIEFING SCHEDULE

The United States of America, through the undersigned Assistant United States Attorney, and T.C., through undersigned counsel, hereby submit this Proposed Briefing Schedule. In support of this proposed briefing schedule, the parties state as follows:

- 1. Counsel for T.C. has a murder trial beginning next week that is expected to continue through the end of July.
- 2. Counsel for T.C. has pre-planned travel out of the country for much of August, returning August 26, 2024.
- 3. Counsel for T.C. has a complex murder trial scheduled to begin September 16, 2024 that may go into the first week of October.
- 4. Prior to the Court's July 10, 2024 Order directing the parties to file a proposed briefing schedule (Dkt. 61), the parties had discussed a schedule that contemplated an opportunity for the government to file a reply brief. The parties understand, however, that the Court has ordered briefing limited to one round without replies or sur-replies. To the extent the Court is inclined to reconsider its ruling on reply briefs, the parties' proposed schedule includes the deadline they initially contemplated for a reply brief. The government proposes to limit its reply brief to no more than 10 pages on new issues raised in T.C.'s brief and, to the extent T.C.'s brief does not raise any new issues, the government will not seek to file a reply.

WHEREFORE, the parties propose the following briefing schedule:

- Government brief due August 23, 2024
- T.C. brief due September 13, 2024
- [Government reply brief due September 27, 2024]
- Extradition hearing on October 15, 2024.¹

Respectfully submitted,

Respectfully submitted,

JOSHUA S. LEVY Acting United States Attorney T.C.

By: <u>/s/ Kristen A. Kearney</u> KRISTEN A. KEARNEY

Assistant U.S. Attorney

By: /s/ Martin G. Weinberg

MARTIN G. WEINBERG 20 Park Plaza, Suite 1000 Boston, MA 02116

By: <u>/s/ Victoria Kelleher</u>

VICTORIA KELLEHER Kelleher & Maceo, P.C. 53 State Street, Suite 500 Boston, MA 02109

Date: July 10, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Kristen A. Kearney
KRISTEN A. KEARNEY
Assistant U.S. Attorney

¹ To the extent the Court is not available on October 15, 2024, the parties request a hearing on October 16, 2024. Counsel for the government is not available October 17 or 18, 2024.